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*Counsel for Defendant Innovis Data Solutions, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORP., <i>et al.</i> ,  Plaintiffs,  v.  INNOVIS DATA SOLUTIONS, INC., <i>et al.</i> ,  Defendants.	Docket No. 1:24-cv-04176-HB  CIVIL ACTION  <b><u>DEFENDANT INNOVIS DATA SOLUTIONS, INC.'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT, PURSUANT TO FED. R. CIV. P. 12(b)(6)</u></b>  Motion Day: April 21, 2025
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PLEASE TAKE NOTICE that on April 21, 2025, or as soon thereafter as counsel may be heard, pursuant to this Court's Order dated January 22, 2025 [ECF No. 41], the undersigned counsel for Defendant Innovis Data Solutions, Inc. ("Innovis") shall move before the Honorable Harvey Bartle III, U.S.D.J., at the United States District Court for

the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101, for an order dismissing Plaintiffs' Complaint in its entirety, with prejudice, pursuant to Fed. R. Civ. P. 12(b)(6) ("Innovis's Motion to Dismiss").

**PLEASE TAKE FURTHER NOTICE** that in support of Innovis's Motion to Dismiss, Innovis will rely upon the Memorandum of Law in Support of Innovis's Motion to Dismiss, the Declaration of Jason Spak, the exhibits thereto, and the Request for Judicial Notice submitted herewith, as well as any submissions offered on reply.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to the Court's Order dated January 22, 2025 [ECF 41], DM Group, Inc. is filing a Consolidated Motion to Dismiss at Case No. 1:24-cv-04075 ("Consolidated Motion to Dismiss"); that Innovis joins the Consolidated Motion to Dismiss and any and all Memoranda of Law in support thereof; such that Innovis adopts and offers the entirety of the arguments set forth in support of the Consolidated Motion to Dismiss at Case No. 1:24-cv-04075 as further support for Innovis's Motion to Dismiss.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of an Order granting Innovis's Motion to Dismiss is also submitted herewith.

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**CERTIFICATE OF SERVICE**

I certify that on March 18, 2025, I filed the foregoing DEFENDANT INNOVIS'S MOTION TO DISMISS with the Court's Electronic Case Filing (ECF) system, which will send a Notice of Electronic Filing (NEF) to, and thereby effect service upon, all parties through their counsel of record.

/s/ Jill A. Guldin

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Pierson Ferdinand LLP